

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE TRICOR DIRECT PURCHASER)
ANTITRUST LITIGATION) CASE NO. 05-340
) (SLR)
) (consolidated)

THIS DOCUMENT RELATES TO:)
)
Louisiana Wholesale Drug. Co., Inc. (05-340))
Rochester Drug Co-Operative, Inc. (05-351))
Meijer, Inc., et al. (05-358))
)

**SUPPLEMENTAL AFFIDAVIT OF LEAD COUNSEL
BARRY S. TAUS, ESO.**

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

1. I, Barry S. Taus, am Lead Counsel for the consolidated direct purchaser class actions in the above-captioned matter. This affidavit is submitted in further support of Direct Purchaser Class's Motion For An Award Of Attorneys' Fees, Reimbursement Of Expenses And Incentive Awards To The Class Representatives (the "Motion"), and the Affidavit of Lead Counsel submitted therewith. See, D.I. No. 530 (Motion) and 531 (Lead Counsel Affidavit).

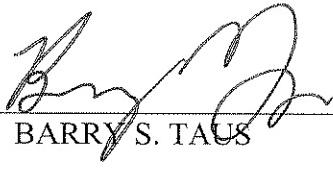
2. In submissions made in association with Class Counsel's request for reimbursement of expenses, Class Counsel have described the type and amount of expenses for which we have requested reimbursement. *See* Lead Counsel Affidavit at

¶101 & Ex. 4, ¶16. A significant portion of these expenses have been incurred in connection with the retention and preparation of expert witnesses. *See, id.*

3. Subsequent to the filing of the Motion, Class Counsel learned that \$259,624.03 in unpaid expert fees were inadvertently omitted from Class Counsel's request for reimbursement of expenses. These fees were incurred entirely in association with: (1) the preparation of expert reports submitted during discovery in this case, and (2) the preparation of an expert witness for potential testimony at trial.

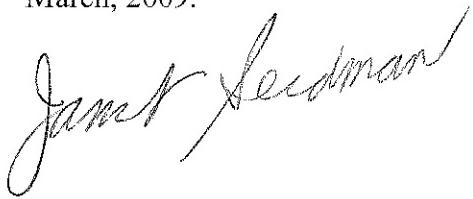
4. As fully described in the Lead Counsel Affidavit, Class Counsel incurred \$3,330,791.79 expenses in the prosecution of this case. The additional expert fees described above bring the total expenses incurred by Class Counsel to \$3,791,978.78. Of these expenses, approximately 90% have been paid by Class Counsel; the remaining expenses (some of which have only recently been incurred or billed for) are owed by Class Counsel and are in the process of being paid. Accordingly, and for reasons fully set forth in the Motion, Class Counsel respectfully request reimbursement of \$3,791,978.78. for expenses.

The foregoing is declared true and correct under the penalty of perjury under the laws of the United States.



BARRY S. TAUS

Sworn to this 12 day of
March, 2009.



JANET SEIDMAN
Notary Public State Of New York
No. 24-4705123
Qualified in Kings County
Commission Expires January 31, 2010